

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD JULY 1, 2022 THROUGH JULY 31, 2022**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition  
Date")

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**SECTION 1  
FEE SUMMARY**

X Monthly Fee Statement No. 9                      or    ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2022 through July 31, 2022 (the "Ninth Statement Period").

Total Fees:	\$189,859.25
Total Disbursements:	\$3,487.93
Total Fees Plus Disbursements:	\$193,347.18
Minus 20% Holdback of Fees:	\$37,971.85
Amount Sought at this Time:	\$155,375.33

	<u>FEEs</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$2,053,514.25</u>	<u>\$26,828.81</u>
Total Fees Allowed to Date:	<u>\$804,771.00</u>	<u>\$8,121.62</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Fee Examiner Adjustment:	<u>(\$38,062.50)</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$242,136.15</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$1,773,315.60</u>	<u>\$26,828.81</u>

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate</b>	<b>Fees</b>
Paul R. DeFilippo, Esq., Partner	1978	56.9	\$925	\$51,568.75
James N. Lawlor, Esq., Partner	1992	74.2	\$875	\$64,925.00
Lyndon M. Tretter, Esq., Partner	1986	1.1	\$875	\$962.50
Joseph F. Pacelli, Esq., Associate	2020	71.0	\$580	\$40,165.00
Brian Y. Umana, Esq., Associate	2021	12.2	\$425	\$5,185.00
Stephanie A. Weaver, Law Clerk (Admission Pending)	N/A	57.2	\$340	\$19,448.00
Anthony A. Hallums, Paralegal	N/A	8.3	\$225	\$1,867.50
Michele Klinger, Paralegal	N/A	8.5	\$225	\$1,912.50
Scarlet E. Meltzer, Paralegal	N/A	7.4	\$225	\$1,665.00
Celenydiana Rodriguez, Paralegal	N/A	10.8	\$225	\$2,160.00

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) <b>Asset Disposition:</b> Sales, leases, abandonment and related transaction work.	0	0
c) <b>Avoidance Action Litigation:</b> Preference and fraudulent transfer litigation.	0	0
d) <b>Business Operations:</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) <b>Case Administration:</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	46.4	\$22,527.00
f) <b>Claims Administration and Objections:</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	7.9	\$3,859.50
g) <b>Employee Benefits/Pensions:</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) <b>Fee/Employment Applications:</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	73.9	\$36,116.50
i) <b>Fee/Employment Objections:</b> Review of an objections to the employment and fee applications of others.	0	0
j) <b>Financing:</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) <b>Litigation:</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	130.7	\$92,826.50
l) <b>Meeting of Creditors:</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	0	0

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
<b>m) Plan and Disclosure Statement:</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	36.2	\$28,985.00
<b>n) Relief from Stay Proceedings:</b> Matters relating to termination or continuation of automatic stay under 362.	4.3	\$3,196.00
<b>o) Accounting/Auditing:</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
<b>p) Business Analysis:</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
<b>q) Corporate Finance:</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
<b>r) Data Analysis:</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
<b>s) Litigation Consulting:</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
<b>t) Reconstruction Accounting:</b> Reconstructing books and records from past transactions and bringing accounting current.	0	0
<b>u) Tax Issues:</b> Analysis of tax issues and preparation of state and federal tax returns.	0	0
<b>v) Valuation:</b> Appraise or review appraisals of assets.	0	0
<b>w) Travel Time</b>	8.2	\$2,348.75
<b>SERVICE TOTALS</b>	<b>307.6</b>	<b>\$189,859.25</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
July 2022 - Federal Express Invoice	\$30.13
12/02/2021 - Local Travel - JNL (Travel, tolls, parking)	\$75.55
12/15/2021 - Local Travel - JNL (Travel, tolls, parking)	\$75.55
12/16/2021 - J & J Court Transcribers, Inc. inv # 2021-01782	\$707.85
06/14/2022 - Travel to office to print documents for court hearing	\$59.30
06/15/2022 - J & J Court Transcribers, Inc. inv # 2022-01077	\$949.85
07/07/2022 - J & J Court Transcribers, Inc. inv # 2022-01185	\$127.05
07/27/2022 - J & J Court Transcribers, Inc. inv # 2022-01311	\$1,288.65
06/15/2022 - J & J Court Transcribers, Inc. inv # 2022-01335	\$174.00
<b>DISBURSEMENTS TOTALS</b>	<b>\$3,487.93</b>

## SECTION IV CASE HISTORY

1. Date of Retention: December 16, 2021, effective as of November 12, 2021 [Dkt. 851] (the "Retention Order").<sup>1</sup>
2. Summary explaining the nature of the work performed and the results achieved:
  - Facilitated the drafting, finalization and filing of (i) several oppositions and responses and submission of orders, including the: memorandum regarding the need for estimation, response to insurers' motions for relief from the automatic stay, response in support of motion to stay briefing in SDCERA appeal, reply in support of the need for estimation, reply in support of motion to stay appellate briefing schedule, declarations in support of motion for a temporary restraining order/preliminary injunction, and orders relating to the state actions preliminary injunction appeal briefing, NM/MS adversary proceeding injunctive relief and briefing schedule, securities class action and stay of retention pleadings in appeals cases, (ii) adversary complaint in NM/MS adversary proceeding, (iii) supplemental certifications and declarations in support of retention applications, (iv) monthly fee statements and supplemental fee statements for the Debtor's professionals, (v) certifications of no objection regarding monthly fee statements, (vi) Debtor's monthly operating report, (vii) ordinary course professionals quarterly report, (viii) notices of appearance applications in appellate dockets, (ix) supplemental certifications for second interim fee application for Debtor's professionals, (x) notice of withdrawal of counsel, (xi) letters to the court regarding discovery issues and SDCERA briefing stay motion, (xii) certificates of service, and (xiii) hearing agendas;
  - Analyzed issues and counseled the Debtor with respect to, among other things, (i) retention of the Debtor's professionals, (ii) motion to lift stay, (iii) mediation, (iv) estimation, (v) discovery, and (vi) appeals of the motion to dismiss, preliminary injunction, Skadden retention, Jones Day retention, and Securities Adversary orders;
  - Participated in discussions with the Fee Examiner and Debtor's professionals regarding the Debtor's professionals' First and Second Interim Fee Applications;
  - Participated in the hearings and conferences held during this period, and counseled the Debtor with respect thereto;
  - Monitored main case, adversary proceedings, and appellate dockets; and

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<sup>1</sup> The Retention Order is attached hereto as Exhibit A.

- Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor's administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: August 30, 2022

/s/ Paul R. DeFilippo  
Paul R. DeFilippo